

1 **GEORGE L. HASSELBACK, ESQ. – (F0325-NMI)**  
2 **O'Connor Berman Dotts & Banes**  
3 **Second Floor, Nauru Building**  
4 **P.O. Box 501969**  
5 **Saipan, MP 96950**  
6 **Telephone No. (670) 234-5684**  
7 **Facsimile No. (670) 234-5683**

8 *Attorneys for Plaintiff Lisa S. Black*

9

10 **IN THE UNITED STATES DISTRICT COURT**  
11 **FOR THE**  
12 **COMMONWEALTH OF THE NORTHERN MARIANA ISLANDS**

13 **LISA S. BLACK, ) CIVIL ACTION NO. 05-0038**

14 **Plaintiff, )**

15 **vs. )**

16 **JIM BREWER, individually and in his ) DECLARATION OF MICHAEL W.**  
17 **official capacity as Acting Principal for ) DOTTIS IN SUPPORT OF SECOND**  
18 **Hopwood Junior High School, ) MOTION TO COMPEL**  
19 **COMMONWEALTH OF THE NORTHERN )**  
20 **MARIANA ISLANDS PUBLIC SCHOOL )**  
21 **SYSTEM, and JOHN AND/OR JANE DOE, )**

22 **Defendants. )**

23 I, Michael W. Dotts, declare under the penalty of perjury according to the laws of the  
24 Commonwealth of the Northern Mariana Islands and the United States of America, that the  
25 following is true and based upon my personal knowledge, except where noted otherwise, and if  
26 called to testify, I could do so competently:

27  
28 1. On August 7, 2006, I met and conferred with the attorneys for CNMI Public School  
System and Jim Brewer to attempt to resolve several issues that have arisen with regard to the

1 various Defendants' responses to Plaintiff's latest round of discovery requests. Specifically,  
2 these are the issues raised in the letter from George L. Hasselback to the Defendants' attorneys  
3 dated August 5, 2006 and attached to my client's Memorandum in Support of Second Motion  
4 To Compel.

5  
6 2. Additionally, I suggested that, in order to save this Court and the parties time and  
7 expense in holding another hearing on discovery issues, that if we could not resolve these  
8 issues, that the parties stipulate to having both of these Motions to Compel heard on the same  
9 date.

10  
11  
12 3. Counsel for the Defendants refused to amend their answers to the disputed discovery  
13 requests, but agreed to stipulate to having both of these motions heard at the same time on  
14 August 24, 2006. I then informed George Hasselback of this stipulation and asked that he  
15 make arrangements with the Court to reschedule the hearing on both motions for a time on  
16 August 24, 2006.

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18  
19 Signed on Saipan, Commonwealth of the Northern Mariana Islands, this 7<sup>th</sup> day of  
20 August, 2006.

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23  
24 /s/ \_\_\_\_\_  
25 Michael W. Dotts  
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